REMARKS

This amendment is in response to the Non-Final Office Action dated January 21, 2004.

Claim 15 has been amended to correct a typographical error. New claims 16-30 are added.

Support for the new claims can be found throughout the specification and especially at pages 24-28. No new matter has been added. Claims 1-30 are pending.

Claims 1-15 were rejected under 35 U.S.C. 103(a) as being unpatentable over Glaser (US Patent No. 5,953,731) in view of Foley (U.S. Patent No. 5,706,502). This rejection is respectfully traversed.

Applicants maintain all prior arguments and positions as set forth in the Amendment dated August 19, 2002; Request for Reconsideration dated February 7, 2003; Appeal Brief dated May 21, 2003; and the Preliminary Amendment dated October 14, 2003. The Office Action asserts that previous arguments pertaining to Glaser's failure to teach or suggest a page object control "are currently moot in view of the new grounds of rejection" (Office Action, page 8). However, the Office Action dated January 21, 2004 continues to rely in Glaser to provide the "page object control" and continues to equate the same elements with the "page object control" under the same rationale. The "new grounds of rejection" as set forth in the Office Action dated January 21, 2004 are substantially directed to "methods or properties" and do not significantly address the "page object control". Because the Office Action substantially maintains its prior position regarding the "page object control", Applicant's prior arguments and positions are still applicable.

As set forth in the preliminary amendment dated October 14, 2003, claim 1 recites a page object control on a first page for storing a list of at least one of a method and a property associated with the first page, wherein a second page is capable of instantiating the page object control and implementing the at least one of a method and a property associated with the first page into the second page.

As previously described in the Amendment filed August 19, 2002, Glaser fails to teach or suggest a page object control as recited in claim 1. Rather, Glaser merely discloses a computer program for designing web pages where a user drags and drops a selected object (e.g., a "form") from a window into a code editor window in order to insert code for the object into the HTML code of the web page being designed. See Amendment dated April 19, 2002, page 4, last line through page 5, line 2 and Glaser reference, Figs 6B-D. Thus, Glaser merely discloses adding code to a web page design by dragging and dropping an object into an editor window. Glaser does not teach or suggest a page object control as recited in claim 1.

The Final Office Action dated November 7, 2002 asserted that Glaser disclosed an Applet list. The Applet list of Glaser is a "window displaying applets for all forms and projects known to the development computer" (Glaser, col. 7, lines 44-45 and Fig. 7C). The Patent Office asserts:

> Glaser teaches a software development environment comprising an Applet control list of all forms and projects. Glaser also teaches inserting controls from one form or HTML page onto another HTML page (Glaser Abstract, column 7 lines 40-45; compare with claim 1 "a page object control on a first page for storing a list ... associated with said first page")

Final Office Action, page 3, lines 1-4.

Appellants pointed out in the Request for Reconsideration dated February 7, 2003 that Glaser fails to teach or suggest the page object control as recited in claim 1. Although Glaser states in the abstract that "a user may select control from one form or HTML page and insert it into another HTML page", the "control" as referred to by Glaser is not equivalent to the page object control of claim 1. The term was extensively addressed in the Request for Reconsideration at pages 2-4 and is not repeated here. Briefly, it was explained that the term "control" as used by Glaser referred to applet code being inserted into the code for an HTML page displayed in a code editor window as illustrated in Fig. 7C of Glaser. Specifically, "control" in the Glaser reference refers to one of the elements (e.g., "GRID1") on the Applet list as illustrated in Fig. 7C of Glaser. The Examiner does not refute or deny this interpretation. There is no showing that the control of Glaser equates to the page object control as set forth in the claims.

Given that an element on the Applet list of Fig. 7C of Glaser is the "control", which the Examiner equated with the page object control of claim 1, Glaser's "control" must be "on a first page" to relate to the claims. Further, to be applied as the Examiner has suggested, Glaser's control must be for "storing a list of at least one of a method and a property associated with the first page", as recited in claim 1. As was described in the Request for Reconsideration, Glaser fails to teach or suggest a first page. In the interpretation adopted by the Patent Office, the "control" of Glaser (e.g., "GRID1" on the Applet list) is on an Applet list and the Applet list is "the first page". However, the Applet list is merely "a window displaying applets for all forms and projects known to the development computer" (see Glaser, col. 7, lines 43-45) and does not

constitute "a first page." The Applet list is not a page at all but rather a window displayed by the web page design program that lists objects that may be dragged and dropped into an editor window.

Moreover, the page object control is for storing a list of at least one of a method and a property associated with the first page. Thus, even if one were to erroneously conclude that the Applet list window of Glaser is equivalent to "a first page" of claim 1, the "control" (e.g., GRID1) of Glaser does not store a list of at least one of a method and a property associated with the Applet list (assumed to be the "first page"). As was described in the Request for Reconsideration (page 5, first paragraph), the elements on the Applet list of Glaser are merely generic objects "known to the development computer" (see Glaser col. 7, line 45) and are not associated with the first page. In fact, Glaser fails to teach or suggest a "first page" at all.

The Patent Office also appears to alternatively equate the Applet list of Glaser with the page object control of claim 1. In this interpretation, the Applet list of Glaser itself was equated with the "page object control" of claim 1 and the elements on the Applet list (e.g., "GRID1") was equated with "methods" or "properties". However, the elements on the Applet list are not equivalent to methods or properties associated with the first page. The elements on the Applet list each constitutes HTML code for scripting of a specific graphical element (a grid, for example) without describing any methods or properties associated with the first page. As was pointed out in the Request for Reconsideration (page 5, second paragraph), applets are computer programs for performing a task and, without more, do not teach or suggest methods and properties.

Moreover, if the Applet list of Glaser is equated with the "page object control" of claim 1, then Glaser fails to teach or suggest the Applet list on a first page. The Applet list is merely "a window displaying applets for all forms and projects known to the development computer" (see Glaser, col. 7, lines 43-45). The Applet list is not "on a first page". Indeed, the Applet list as taught does not relate to a page at all.

In response to the lack of teaching or suggestion in Glaser of "at least one of a method and a property associated with the first page", the Final Office Action asserts that "it would have been obvious to interpret said forms from said applet list as associated with HTML pages, providing the advantage of form objects that are customized to different pages." See Final Office Action page 3, lines 18-19. In this interpretation, the Patent Office equates the Applet list with "a page object control" and the individual elements on the Applet list (e.g., "FORM" or "GRID") as "a method" or "a property". As discussed above and in the Request for Reconsideration, the applets on the applet list are not methods or properties. However, even assuming one would erroneously conclude that applets are either methods or properties, one of ordinary skill in the art would still not arrive at the present invention. If the Applet list is assumed to be "a page object control" as the Patent Office has assumed, then to arrive at claim 1, at least one of the elements on the Applet list must be associated with the first page. As discussed above, under this assumption, Glaser fails to teach or suggest a first page because there is no teaching or suggestion that the Applet list is "on a first page." The Applet list is merely a window containing a list of items that may be dragged and dropped into a code editor window and does not relate to a page as claimed.

Further, Glaser fails to teach or suggest a second page as recited in claim 1. Claim 1 recites that the second page is capable of instantiating the page object control and implementing the at least one of a method and a property associated with the first page into the second page. Nowhere does Glaser teach or suggest instantiating the page object control. Indeed, Glaser fails to teach or suggest a page object control. Regardless of which set of assumptions adopted by the Patent Office, Glaser fails to teach or suggest the second page. In one assumption, the Patent Office asserts that the "page object control" is the Applet list and stores a list of applets (e.g., "GRID1") which the Patent Office further equates with a "method" or a "property". The Patent Office then equates the second page of claim 1 with the code editor window in Glaser in Fig. 7C. As discussed above and in the Request for Reconsideration, applets alone are not methods or properties. Moreover, this assumption ignores the fact that there is no "first page" in Glaser. However, even ignoring these facts, Glaser still fails to teach or suggest a second page because the second page, as recited in claim 1, is capable of instantiating the page object control. However, the code editor window in Glaser is not disclosed as instantiating the applet list. Thus, there is no equivalent to the second page under this set of assumptions adopted by the Examiner.

In an alternative assumption adopted by the Examiner, the Examiner asserts that the "page object control" is equivalent to any one of the applets on the Applet list in Fig. 7C of Glaser and the Applet list itself constitutes the "first page." As described above and in the Request for Reconsideration, the Applet list of Glaser is not a "first page". An Applet list is merely a window displaying a list of elements that may be dragged and dropped into a code editor window. Thus, the Applet list is not a page. Moreover, the "page object control" is not

equivalent to any of the applets on the Applet list (e.g., "GRID1") because none of the applets on the Applet list in Glaser stores a list of a least one of a method and a property associated with the first page (assumed to be the Applet list itself in this scenario). The applets on the Applet list in Glaser are merely application scripts and are not methods or properties associated with the Applet list itself. Also, Glaser fails to teach or suggest the second page under these assumptions because the second page, as recited in claim 1 is capable of instantiating the page object control, the page object control on a first page for storing a list of at least one of a method and a property associated with the first page. Glaser does not teach or suggest any of these elements.

In response to Appellants' arguments, the Patent Office asserted in the Advisory Action dated March 5, 2003 that "Applicant does not clarify the definition of a page object control in the instant claims" and that "said control can be fairly interpreted ... as taught by Glaser." The Patent Office does not offer any further support for this contention. Nor does the Advisory Action address or refute any of the shortcomings and deficiencies of Glaser as enumerated in the Request for Reconsideration.

In response to the assertion in the Advisory Action that "Applicant does not clarify the definition of a page object control in the instant claims", Appellants respectfully point out that the page object control is recited in claim 1 as "on a first page for storing a list of at least one of a method and a property associated with said first page." Claim 1 further recites that "a second page is capable of instantiating the page object control and implementing at least one of a method and a property associated with the first page into the second page." Not only is the page object control defined in claim 1, but also, as stated above and in the Request for Reconsideration,

Glaser fails to teach or suggest any of the recited features. In summary, Glaser fails to teach an item equivalent to the page object control because nowhere does Glaser teach or suggest anything "on a first page for storing a list of at least one of a method and a property associated with said first page, wherein a second page is capable of instantiating said page object control and implementing said at least one of a method and a property associated with said first page into said second page." At best, Glaser merely discloses a computer program that displays an Applet list window for listing applets (not shown to have methods or properties) in which the applets (not the applet list itself) may be dragged and dropped into an editor window for running script to design a web page. Without more, claim 1 is allowable over Glaser.

Independent claim 8 and the dependent claims from claims 1 and 8 are allowable for similar reasons relating to the page object control.

Claim 3 recites editing a first page, referencing a second page from the first page, referencing at least one of a method or property from the first page, the at least one of a method or property being associated with the second page and storing the first page.

The Examiner equated the "first page" of claim 3 with the Code Editor window of Glaser (Glaser, Fig. 6C and Abstract) in the Final Office Action dated November 7, 2002. However, the Code Editor window of Glaser (Fig. 6C) is not equivalent or suggestive of the first page as recited in Claim 3. The Patent Office asserted in the Final Office Action dated November 7, 2002 that an applet in Glaser is dragged from a window displaying the applet object to a drop location "resulting in a transfer of the applet object ... onto the new form." See Final Office Action, page 4, 3rd paragraph. Even assuming *arguendo* that this is true, Glaser still fails to teach or suggest

claim 3. Claim 3 recites referencing the second page from the first page. Glaser merely discloses a computer program that displays windows containing objects to drag and drop but fails to teach or suggest pages. Even if one were to erroneously conclude that the windows were pages, Glaser still fails to teach or suggest referencing the second window from the first window. Glaser merely discloses a user dragging an element from one portion of a display to another but does not teach or suggest referencing the second page from the first page. As pointed out in the Request for Reconsideration, Glaser illustrates in Fig. 6C, a user dragging and dropping "FORM1" into a code editor window. However, the windows themselves do not reference each other. Rather, a user drags an element from one window and drops it into a second. Thus, Glaser fails to teach or suggest claim 3.

In response to this deficiency in Glaser, the Advisory Action dated March 5, 2003 states that "since Applicant does not clarify the definition of a page object control in the instant claims, said control can be fairly interpreted (within the scope of the art) as taught by Glaser". However, claim 3 does not recite a page object control. Nor did Appellants assert that claim 3 was allowable because of a definition of a page object control. The Advisory Action does not provide a rationale for maintaining the rejection of claim 3. Appellants' arguments in support of claim 3 remain unrefuted and uncontested by the Patent Office.

The dependent claims 4-7 are allowable for at least the reasons stated above.

Claims 12-15 are believed allowable for similar reasons.

The Office Action dated January 21, 2004 asserts that although Glaser fails to teach or suggest referencing a second page from a first page, "it would have been obvious to initially

reference the page ... prior to copying said control" (Office Action, page 8). However, in Glaser, it is the *user* that "references" the page by dragging and dropping applet code from one location to another. The user does not reference the second page *from a first page*. Nor would it have been obvious to one of ordinary skill in the art, given the disclosure of Glaser, to reference the second page from a first page. For a user to reference a second page *from a first page*, the user would have to be *in* the first page himself. It is not clear how it is even possible for the user himself to be in the first page while selecting applet code from the second page.

New claims 16-30 are allowable over the cited prior art.

Claim 16 recites "a page object control on a page, said page object control including a list of objects and associated methods and properties relating to said objects, said page object control being instantiated by a page object control on a referencing page and providing a list of objects contained on said page to said referencing page." Glaser and Foley, either alone or in combination, fail to teach or suggest this feature.

Glaser discloses a user dragging and dropping applet code from one location to another. Foley discloses a portfolio manager system and method that does not relate to page object controls. The applets of Glaser are not equivalent to the "page object control." However, even if the applets of Glaser is equivalent to the page object control as the Office Action asserts, neither Glaser or Foley teaches or suggests "said page object control being instantiated by a page object control on a referencing page." Glaser merely discloses a user dragging applet code (e.g., "FORM 1" – Fig. 6D or 7C) from one location to another. Nowhere does Glaser or Foley teach or suggest applet code (equated to the page object control by the Office Action) on a "referencing

page" instantiating applet code from a "first page". In Glaser, it is the user (not additional applet code) that drags applet code from one location to another.

Further, Glaser fails to teach or suggest the "applet code" (equated to the page object control by the Office Action) as "providing a list of objects contained on said page to said referencing page." Even if either of the applet list or applet of Glaser is equivalent to the page object control as the Office Action asserts, Glaser still fails to teach or suggest that the applet list or applet provides "a list of objects contained on said page to said referencing page." In Glaser, a user drags and drops applet code from one location to another (e.g., <http://www.somesite.com/pat APPLET CODE=grid1.class WIDTH=100 HEIGHT=50>). See Fig. 6D or 7C of Glaser. The code that the Office Action asserts is provided to a "referencing page" is not "a list of objects contained on said first page" but instead is merely code of a specific applet.

Claim 16 recites "a first page object control on a first page for scanning said first page for content to create a list of at least one of a method and a property present on said first page. Glaser and Foley, either alone or in combination, fail to teach or suggest this feature.

Glaser discloses a user dragging and dropping an applet into a page. Foley discloses a portfolio manager system and method that does not relate to page object controls. The Office Action equates either an applet list or an applet (of Glaser) with a "control" and "page object control". Even if this comparison were proper, neither Glaser nor Foley teaches or suggests the "page object control" (i.e., the applet list or applet as cited by the Office Action) as "scanning said first page for content to create a list of at least one of a method and a property present on

said first page." Neither the applet list nor applet of Glaser scan any page at all or create any lists pursuant to the scanning.

Claim 16 further recites a second page object control on a referencing page, said second page object control being capable of creating a reference to said first page object control on said first page. Glaser and Foley, either alone or in combination, fail to teach or suggest this feature.

Glaser discloses a user dragging and dropping a "control" from one page to another page. Foley discloses a portfolio manager system and method that does not relate to page object controls. Even if a "page object control" could be an applet list or applet (Fig. 7C. Glaser) as the Office Action asserts, Glaser still fails to disclose the applet list or applet on a "second page" as being capable of creating a reference to a page object control (i.e., another applet or applet list) on a "first page". Glaser merely discloses dragging applet code from one page to another by a user (e.g., Fig. 6D, Glaser).

Claim 16 further recites that "creating a reference to said first page object control comprises locating said first page object control on said first page by said second page object control, [and] instantiating said first page object control on said second page via said second page object control."

Glaser discloses dragging and dropping a "control" from one HTML page to another HTML page. Foley discloses a portfolio manager system and method that does not relate to page object controls. Even if a "page object control" could be an applet list or an applet as the Office Action asserts, Glaser and Foley, either alone or in combination, still fail to teach or suggest locating a *first* applet list or applet (equated to the "page object control" by the Office Action) on

a first page *by a second applet/applet list* and instantiating the *first* applet on the *second* page via the *second* applet. Glaser only discloses dragging and dropping applet code from one point to another but fails to teach or suggest the applet itself (e.g., "FORM1") as locating any other applet at all or instantiating the applet via the second applet.

Claim 16 further recites "receiving information from said first page object control, said information comprising said list of at least one of a method and a property present on said first page; and implementing said at least one of a method and a property on said referencing page, said at least one of a method and property being present on said first page."

Glaser discloses dragging and dropping a "control" from one page to another page. Even if an applet list or an applet could be equated with a "page object control" as the Office Action asserts, Glaser fails to teach or suggest implementing a method or property on a *referencing* page, the method or property being on a *first* page. At best, Glaser only discloses dragging applet code from one page to another. Foley discloses a portfolio manager system and method but also fails to teach or suggest, either alone or in combination with Glaser, implementing a method or property on a referencing page, the method or property being on a first page.

For at least the above reasons, it is respectfully submitted that claim 16 is allowable. Claim 17 depends from claim 16 and is allowable for at least the reasons set forth above for claim 16.

Claim 18 recites referencing a second page object control on a second page from a first page object control on a first page.

Glaser discloses dragging and dropping a "control" from one page to another page. Even if the applet list or the applet is equivalent to the "page object control" as the Office Action asserts, Glaser still fails to teach or suggest, either alone or in combination with Foley, a first applet list or applet on a first page referencing a second applet list or applet on a second page. Glaser merely discloses dragging and dropping applet code from one point to another. Nowhere does Glaser teach or suggest the applet code itself referencing another applet code on a second page from a first page at all.

Claim 18 further recites "instantiating said second page object control of said second page onto said first page and receiving a list of objects on said second page."

Glaser merely discloses dragging and dropping a "control" from one page to another page. Even if an applet or applet list is equivalent to the "page object control" as the Office Action asserts, Glaser still fails to teach or suggest, either alone or in combination with Foley, instantiating the applet (or applet list) from a second page onto a first page and receiving a list of objects *on the second page*. Glaser merely discloses dragging and dropping applet code from one page to another page. However, neither of the pages disclosed by Glaser is described as receiving a list of objects *on the other page*.

Claim 18 further recites "referencing at least one of a method or property on said list of objects on said second page from said first page, said at least one of a method or property being located on said second page."

Glaser merely discloses dragging a "control" from one page to another page. Even if the applet list or the applet is equivalent to "page object control" as the Office Action asserts, Glaser

still fails to teach or suggest, either alone or in combination with Foley, the claimed invention. The pages of Glaser merely provide applet code for dragging or receive dragged applet code from other pages. No other function of the pages is disclosed by Glaser (such as referencing a method or property).

For at least the above reasons, it is respectfully submitted that claim 18 is allowable. Claims 19-22 depend from claim 18 and are allowable for at least the reasons set forth above for claim 18.

Claim 23 recites "said first page object control on said referencing page instantiates said second page object control from said referenced page."

Glaser discloses dragging and dropping a "control" from one page to another page. Even if an applet list or an applet is equivalent to the "page object control" as the Office Action asserts, Glaser still fails to teach or suggest, either alone or in combination with Foley, a first applet list or applet (equated with "page object control" but the Office Action) on one page instantiating a *second* applet list or applet from another page. Glaser merely discloses dragging and dropping an applet code from one point to another by a user. Notably, the applet itself does not instantiate another applet from another page.

Claim 23 further recites a second page object control on a referenced page "storing a list, said list comprising at least one of a method and a property on said referenced page."

Glaser discloses dragging and dropping a "control" from one page to another page. Even if an applet list or an applet is equivalent to the "page object control" as the Office Action asserts, Glaser still fails to teach or suggest, either alone or in combination with Foley, a second

applet/applet list on a referenced page storing a list of a method or property on the referenced page. At best, Glaser merely discloses applet code being dragged and dropped by a user into a page. However, the page in which the applet code is dropped does not store a list of a method or property on the page.

Claim 23 further recites that the first page object control on the referencing page "receives said list from said second page object control, and is capable of incorporating said at least one method or property on said referenced page to support script in said referencing page."

Glaser discloses dragging and dropping a "control" from one page to another page. Even if an applet list or an applet is equivalent to the "page object control" as the Office Action asserts, Glaser still fails to teach or suggest, either alone or in combination with Foley, an applet list/applet on the referencing page (equated to the "code editor window" by the Office Action, Fig. 7C of Glaser) as receiving a list from a second applet list/applet and incorporating a method or property on the referenced page (equated to the applet list by the Office Action, Fig. 7C of Glaser) to support script in the referencing page (i.e., the "code editor window" as per the Office Action). Notably, Glaser fails to teach or suggest an applet list in the "code editor window". After applet code is dragged into the "code editor window", the applet code is not disclosed by Glaser as receiving a list from a second applet list/applet. The applet code does not receive anything, nor is the applet code capable of "receiving" anything. Also, the applet code of Glaser, after being dragged into the "code editor window", does not incorporate a method or property on the referenced page (equated to the applet window by the Office Action – Fig. 7C of Glaser). Even if the Office Action is correct in assuming that the applet thus dragged and dropped

includes "the methods and properties associated with said applet" (Office Action, page 6), the methods and properties are still "associated with said applet" and not disclosed as being "on the referenced page".

For at least the above reasons, it is respectfully submitted that claim 23 is allowable. Claims 24-26 depend from claim 23 and are allowable for at least the reasons set forth above for claim 23.

Claim 27 is allowable for at least the reasons set forth above for claims 18 or 20.

Claim 28 depends from claim 27 and is allowable for at least the reasons set forth for claim 27.

Claim 29 is allowable for at least the reasons set forth above for claim 16.

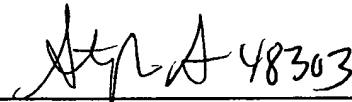Claim 30 depends from claim 29 and is allowable for at least the reasons set forth for claim 29.

Therefore, it is respectfully submitted that claims 1-15 are allowable. The rejection should be withdrawn.

If the Examiner has any questions, he is invited to contact the undersigned to further prosecution.

Respectfully submitted,

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